Alliance OF AUTOMOBILE MANUFACTURERS

February 19, 2002

Mr. Stephen R. Kratzke
Associate Administrator for Safety Performance Standards
National Highway Traffic Safety Administration
400 7th Street S.W. Room #5401D
Washington, DC 20590

Re: Docket No. NHTSA-01-11157, Tire Safety Information

Dear Mr. Kratzke:

The Alliance of Automobile Manufacturers (Alliance), whose members are: BMW Group, DaimlerChrysler, Fiat, Ford Motor Company, General Motors, Isuzu, Mazda, Mitsubishi Motors, Nissan, Porsche, Toyota, Volkswagen, and Volvo, comments herewith on the subject Notice of Proposed Rulemaking (NPRM) published in the December 19, 2001 Federal Register (66 Fed. Reg. 65536). The National Highway Traffic Safety Administration (NHTSA) proposes:

> A new Federal Motor Vehicle Safety Standard with the objective of improving the labeling of tires to assist consumers in identifying tires that may be the subject of a safety recall; and
>
> Provisions for other consumer information to increase public awareness of the importance and methods of observing motor vehicle tire load limits and maintaining proper tire inflation levels for safe operation of a motor vehicle.

The Alliance and its members support the agency's objectives in these labeling and consumer information initiatives. The comments that follow address those aspects of the proposal for which manufacturers' experience and concerns provide the basis for constructive input.

VI Agency Proposal

C. Proposed Labeling Requirements

1. Tire Markings

NHTSA proposes that all labeling information specified under S4.3 of FMVSS 109, including the Tire Identification Number (TIN) appear on both sides of light vehicle tires except for the ply, cord and tube-and-tire type information, which is to remain on one

side of the tire. The Alliance defers to the tire manufacturers or to individual manufacturers to comment on this aspect of NHTSA's proposal.

NHTSA states that it believes it is sufficient to require the maximum pressure on one tire sidewall. The Alliance believes there are pros and cons to having the maximum tire inflation pressure on the tire sidewall and hence we ask the agency refer to the individual vehicle and tire manufacturers comments with regard to this aspect of the NPRM.

NHTSA dismissed suggestions to include other information such as load index, text directing the customer to the tire placard, and other information on the tire sidewall as unnecessary. NHTSA stated that these suggestions are better served through educational campaigns than by additional requirements.

There are several markings that convey useful tire information and as such the Alliance requests that NHTSA allow their inclusion. Two of these are the load index and speed rating currently used in Europe. These tire markings should not be prohibited by NHTSA. That action would result in less harmonization, unique North American tires and unnecessary but costly redundancy of tire tracking systems and inventories.

Another reason to permit these tire markings is that the proposed rulemaking for vehicle labeling applies to new vehicles and the recommended tire(s) for those vehicles, but does not address the aftermarket situation where non-recommended tires and wheels are substituted for those developed, validated and delivered as original equipment. Requiring aftermarket tires to have crucial tire information such as tire size, load index and speed rating marked on the tire sidewall, will help ensure that customers are receiving the appropriate replacement tire, which will improve customer safety.

We strongly encourage NHTSA to take this opportunity to harmonize as much as possible with European requirements by allowing the requirement of the European load index and speed rating symbols to be marked on tires subject to the proposed new standard FMVSS 139. This will help to facilitate adoption of a global tire-marking system.

The Alliance also recommends that optional vehicle manufacturers marking be permitted but not required on the tire sidewall. For example, brands such a BMW, Jaguar and Mercedes market vehicles with specially marked tires, which are also suitable for use in both North American and Europe. Another example is that General Motors (GM) tires are assigned a unique Tire Performance Criteria Specification (TPC Spec) number. The TPC Spec number is molded on the tire sidewall. GM recommends that GM customers replace their tires with those having the same TPC Spec number. GM would like to continue placing the TPC Spec number on the sidewall of the tires on GM vehicles, and would not want the agency to prohibit this beneficial addition from being on the sidewalls of tires. To prohibit optional markings would require unique tires for marking purposes only, increase inventory costs and increase plant tire complexity for no benefit. The potential for recalls due to mislabeled tires would also increase.

2. TIN (Tire Identification Number)

NHTSA proposes two revisions to the tire identification number (TIN: 1) reorder the first six characters of the TIN to contain the plant code and a four-digit date code; and 2) require a uniform font size of 6mm. The Alliance defers to the tire manufacturers with regard to the requirement of a uniform 6 mm font height. However we have serious concerns with the proposed changes to the TIN format.

Automotive manufacturers use the TIN as it is currently specified to uniquely identify tires by manufacturer, plant, tire size, construction and week and year of production. These data allow a manufacturer and its service operations to distinguish the tires involved in a potential tire recall. The consumer benefit cited by NHTSA was "so that the first six characters would contain information required for determining whether a particular tire is subject to recall." This statement underestimates the amount of information needed to determine an affected population of tires for recall purposes, as most tire manufacturing plants produce multiple types of tires at the same plant.

Tire size should remain standard and optional construction code requirements should be allowed to enable a tire manufacturer to uniquely identify tires to be recalled. For example, the elimination of the size code as a mandatory part of the TIN deprives auto manufacturers, tire manufacturers and NHTSA of tire size identification necessary in analyzing, tracking and determining the field performance of specific tires.

A reordering of the TIN characters will also confuse consumers. As the agency has noted, consumers already have trouble understanding how to identify recalled tires. For example with the Firestone recall, many consumers looked only at the tire brand to see whether or not their tires we recalled. It was only with the complete TIN that the actual affected tires could be identified. NHTSA's tire safety campaign – "TIRE SAFETY – Everything Rides On It" launched last November explains what the various codes on tires currently mean. Changing the TIN format would require NHTSA to launch an entirely new campaign to reeducate the public, which can only add to confusion.

In addition, if the TIN is reordered or changed, the transition of the proposed TIN format change will cause consumer confusion because the TIN descriptions in new vehicle owner's manuals will be different than what is on the replacement aftermarket tires. There will be one set of TINs in the field for vehicles and tires produced prior to September 1, 2003 and a second set of TIN's related to tires and vehicle produced after September 1, 2003. Moreover, there will be both old and new TINs in circulation for 3-5 years or longer as pre-September 1, 2003 tires in aftermarket inventories are exhausted in the replacement market. This will make communication and education efforts much more difficult and will cause confusion to consumers. Automotive manufacturers would also need to retrain existing dealership personnel on the proposed TIN and revise all printed materials (warranty policies, forms, etc.), which would require both TIN formats, since replacement tires could contain either of the two formats until all replacement market inventory is depleted.

Automotive manufacturer rely on systems that use the current TIN format to track tires for warranty, match tires to vehicle production and monitor tire performance in the field. Reordering the TIN would increase cost and complexity to track these dual formats. Existing electronic computer system programming, reporting and analysis capabilities are structured around the current TIN groupings (plant code, tire size code, optional codes, date code) and order. Revisions to TIN formatting and content would require software changes, resulting in additional programming and analysis complexities. The NHTSA proposal has not accounted for costs for revising the computer programming code and software revisions necessary to implement the change. Additional cost considerations include lost time, labor and resources due to associated data entry or analysis errors and complexities in utilization of complex TIN data using two different formats.

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It is for all the reasons cited above that the Alliance strongly requests that NHTSA maintain the current TIN groupings, format and order. NHTSA should also require and standardize the codes used to indicate tire size and tire construction.

3. Tire Placard Content & Format

The Alliance supports the agency's intention to establish criteria for tire information labeling and location requirements for light vehicles to make it easier for consumers to locate and comprehend the maintenance information. The agency should specify minimum label content/text (including symbol and character size) and, a common, allowable location on a vehicle. However, determinations on remaining aspects of the label such as color, size, shape, layout, and additional content should be left to individual manufacturers so that there is sufficient flexibility to adopt designs most appropriate for the vehicles to which the labels will be applied. Specifically, we have the following concerns with several aspects of the agency's proposal for placard requirements.

Color

The use of red and/or yellow coloring on the proposed maintenance label, intended for information purposes only, is not warranted. Moreover, using these colors for the proposed labels may dilute the effect of using color to convey other, more important messages, such as cautions and warnings. While we share the agency's desire to emphasize the importance of maintaining proper tire pressure this end will be better served through other means, such as the agency's Tire Safety Program and similar industry education efforts, as well as through the proposed common location requirements and owner's manual reference. Given enhanced consumer awareness, coupled with common location requirements, it is reasonable to expect that consumers will quickly know both why and where to seek the tire placard or pressure information labels and owner's manual text. We also note that the agency has already proposed in a separate rulemaking to require a color tell-tale warning when tire pressure is "significantly under inflated." This additional requirement also addresses the safety aspects of tire inflation. When coupled with improved tire information, tire inflation safety information will be thoroughly addressed by regulation and there will be no demonstrated need for additional requirements, such as multi-colored labels.

Finally, for the reasons stated above, the Alliance concludes the extra cost associated with providing colored labels is not justified. We also note that the agency has significantly underestimated the cost of providing color labels for this purpose.

For these reasons, the Alliance strongly recommends that the agency drop the proposed requirement for providing colored tire placards and pressure information labels.

Label Content Issues

The Alliance shares the agency's view that the label should be dedicated to tire information. However, vehicle manufacturers must be allowed to provide tire information in addition to the required fields proposed in order to accommodate different speed and loading conditions, real world sales practices, and tire/rim optional equipment.. For example, some manufacturers recommend different pressures for higher speeds, loading conditions, or for optional summer/winter tires. In such cases, manufacturers should be permitted to list all relevant tire and inflation information for the various conditions and/or tires on the Tire Inflation Pressure Label. Otherwise, a customer may not even be aware of the important fact that different pressures are needed for such vehicle conditions and optional tires. While the proposed rule does allow such information to be available in the owner's manual or on a label at another location in the vehicle, we are concerned that customers will see only the required pressures on the proposed label and not search out additional information or labels.

Further, a number of luxury, high-performance and specialty vehicles offer optional tires and wheels with different inflation pressures that the consumer may select at the point-of-sale, rather than when the vehicle is assembled. It is also common practice to exchange tires and wheels between vehicles in a dealership's inventory based on a purchasing

customer's preference. In either case, the information on the Tire Information label could be rendered incorrect, necessitating a new label. Printing or stocking such labels at the point-of-sale or receiving them from a centralized location to apply to a vehicle would be complicated, expensive and very difficult to accurately control given the number of potential labels needed for all tire/rim combinations on every model available. Rather than effectively require this as proposed, the Alliance recommends that manufacturers be permitted to list all tires available as optional equipment for a given model, along with associated recommended pressures, on the placard.

In consideration of these real-world practices, as well as to address the needs of second owners, rental drivers, and the installation of replacement/used tires, we believe teaching vehicle operators to simply use the pressure on the label, without first identifying the tires actually on the vehicle, is inappropriate. We believe there needs to be a consistent message to all vehicle operators that they must first identify the tires on their vehicle and then refer to the label for the appropriate pressure.

As the Alliance has stated in previously submitted comments, vehicle operators must share in the responsibility for maintaining proper tire pressure. We do not view providing more than one tire/rim combination with differing tire pressure as a burden or hindrance for customers; rather, such additional information will raise awareness of the possible use of alternative tires and pressures. Finally, allowing a manufacturer to indicate information for multiple tire/rim combinations would be consistent with current allowance for the Certification Label. Part 567(h) allows for the listing of multiple tires and associated gross vehicle and axle weight ratings (GVWR/GAWR).

Spare Tire

The Alliance also recommends that tire and pressure information for *pneumatic* spare tires be allowed, at the manufacturer's option, on the placard or tire pressure information label. A spare tire is not required by regulation, and the agency has therefore generally declined to specify performance or labeling requirements for spare tires. However, tire and pressure information for spare tires may be useful to consumers, particularly in the case of a temporary use spare wheel where the recommended pressure for the spare tire may differ from that for the permanent tires on the vehicle.

Multi-stage Manufacture and Altered Vehicles

The Agency must address specific issues related to vehicles that are manufactured in two or more stages and vehicles that are modified after primary manufacture. The primary manufacturer, in many cases, will not have sufficient information regarding final configuration and vehicle equipment to designate seating capacity and weight limitations for occupants and cargo.

Language

As the agency knows, vehicle manufacturers must accommodate regional differences in language. While doing so may require dedicated, translated labels in some cases, manufacturers should have the flexibility to provide a multi-lingual label, if space allows for it.

For the reasons stated above, the Alliance recommends that optional content be allowed to accommodate different speed/load conditions, optional tires/wheels, pneumatic spare tire information, and multiple languages.

Use of ISO Symbols

As the agency is aware, one of the most vexing problems associated with labeling is accommodating multiple languages. The International Standards Organization (ISO) has partially addressed this problem by creating a range of pictorial symbols designed to replace textual references to common automotive items and aspects. ISO has an approved symbol for the owner's manual, which consists of a pictogram of an open book with an 'i' on it:[1]

This symbol indicates that the owner's manual should be consulted for additional information and is designed to replace words to the same effect. The Alliance recommends that this symbol be allowed in place of the words "see owner's manual for additional information," as proposed in the subject notice. This serves the purpose of letting consumers know where to find additional information, as well as the goal of international harmonization, to which the agency also subscribes.

The Alliance also notes that the proposed tire icon is inconsistent with the tire symbol adopted by ISO. While either pictorial could be technically accommodated in the proposed label, we recommend that the agency adopt the ISO tire warning symbol,[2]

which the agency has already proposed for tire pressure monitoring. As the Alliance pointed out in comments on the NPRM for tire pressure monitoring systems, this symbol, if used consistently by all manufacturers, will soon become familiar to consumers as a

[1] ISO2575 – Road vehicles – Symbols for controls, indicators, and telltales – Annex 'N' #03.
[2] Ibid.

universal tire safety symbol. On the other hand, using different symbols and pictorials for tire safety may confuse consumers, and is in any case counterproductive to the goal of universal symbol recognition.

Option for One or Two Labels

While the Alliance supports—and appreciates—the agency's proposal to allow, at the manufacturer's option, either one or two labels to satisfy the proposed placard requirements of S4.3, we question whether two labels would be needed, even if the tire pressure information were removed to a separate label. The proposed language does not make clear, given the two-label option, how the other label should appear after the tire pressure information is removed. Once this information is extracted from the stand-alone placard, all that remains are the title (i.e., the tire symbol plus the words "Tire Information"), the seating capacity information, and the mandatory loading statement: "The combined weight of occupants and cargo should never exceed XXX pounds." In this case, the title information would be a misnomer; as such a label would no longer contain tire information, per se.

The Alliance recommends that the option to provide a single placard with all required information be preserved as proposed. However, if a manufacturer opts to provide tire pressure information on a stand-alone label, the manufacturer should be permitted to place the remaining information concerning seating capacity and loading on the Certification Label. This placement is arguably more appropriate, anyway, as the Certification Label already contains the maximum loading capacity information for the vehicle. Moreover, the Certification Label is also currently required to be located in the driver's door area. Allowing manufacturers this additional flexibility will facilitate efficient management of the information provided by both labels, given in the limited "real estate" provided for in the location requirements.

For these reasons, the Alliance recommends that manufacturers be allowed to place the seating capacity information and load statement on the Certification Label.

4. Placard or Placard and Label location

The proposal would require the placard or placard and label containing tire inflation pressure to be affixed to the B-pillar, or, if the vehicle does not contain a B-pillar, to the driver's side door edge. The agency reached this conclusion, based on the focus group study that a common location for tire information placard would contribute to consumer awareness by providing a consistent and predictable place for this information. While we generally agree, we request that the agency provide more flexibility in the location requirements than has been proposed. Specifically, we recommend that the agency adopt the same location requirement that currently exists in Part 567.4(c):

> "the label shall be affixed to either the hinge pillar, door-latch post, or the door edge that meets the door-latch post, next to the driver's seating position, or if none of these locations is practicable, to the left side of the instrument panel. If that location is not practicable, the label shall be affixed to the inward-facing surface of the door next to the driver's seating position. If none of the preceding locations is practicable, notification of that fact, together with drawings or photographs showing a suggested alternate location in the same general area, shall be submitted for approval to the Administrator, National Highway Traffic Safety Administration, Washington, D.C. 20590. The location of the label shall be such that it is easily readable without moving any part of the vehicle except an outer door."

This would preserve the intent of the requirement to have the label placed in the vicinity of the driver's door opening, but would allow flexibility in cases where this is impossible or impractical. This flexibility is needed to accommodate vehicles that either do not have a conventional B-pillar, or do not have enough room on the B-pillar, nor sufficient area on the driver's door edge. In addition, some manufacturers market right-hand drive vehicles for postal and special delivery use, for which the driver's door opening is on the right, rather than left, side of the vehicle. It would be very disruptive to require that vehicle-labeling operations in the plant be relocated to the opposite side of the vehicle to accommodate such limited production vehicles. In such cases, the language quoted above would allow manufacturers to request permission to place the label(s) in an alternative location on the vehicles in question.

For purposes of consumer need the tire pressure information is more significant than the certification label. The Alliance therefore suggests that NHTSA include a provision that permits the manufacturer to place the Part 567 certification label on the passenger side if both the required vehicle tire information placard and the certification label cannot be accommodated on the driver side. However all tire information would have to be on the same side. Thus if a manufacturer includes the seating capacity and weight information on the certification label as proposed by the Alliance, or takes advantage of splitting the tire related information into two labels as proposed by NHTSA, then both labels with tire related information must be on the same side. The Alliance recommends that this flexibility should be provided in the regulation to minimize the need for manufacturers to submit requests for approval of alternate locations.

5. Owners Manual

The agency proposes that the owner's manual contain a discussion of several topics related to tires and vehicle loading. The Alliance agrees that common language on generic tire information for owners would be beneficial to customers. However any such

requirements are more appropriate in a consumer information regulation [for example, Part 575.104 (d) (iii) now contains owners manual requirements for tire quality information]. We support the intent to provide a reliable source document containing tire and tire safety information to help vehicle operators properly maintain tires and to load vehicles correctly. Tires are designed to give many thousands of miles of service, but they must be maintained in order to get the maximum benefit from them.

We urge the agency to develop this information with standardized language that could be provided with vehicles, either as part of the owner's manual, or as a separate brochure within the information provided to owners with the vehicle.

The Alliance is prepared to work with the agency in standardizing the owner information language.

The agency specifically requested comments on their proposed information pressure and load limit information example and whether that example should be used verbatim. The Alliance agrees that the example is useful and should be used with the following alteration to help improve the clarity of the example.

Step (4) reads:
(4) The resulting figure equals the available amount of cargo and luggage load capacity. For example, if the "XXX" amount equals 1500 lbs. And there will be 5-150 lb passengers in your vehicle, the amount of available cargo and luggage load capacity is 750 lbs. (1500 – 750 (5 x 150) = 750 lbs.)

Step (4) should read:
(4) The resulting figure equals the available amount of cargo and luggage load capacity. For example, if the "XXX" amount equals 1400 lbs. And there will be 5-150 lb passengers in your vehicle, the amount of available cargo and luggage load capacity is 650 lbs. (1400 – 750 (5 x 150) = 650 lbs.).

The loading example's use of 1500 lbs results in the same 750 lbs. value for the combined passenger weight as the combined cargo and luggage capacity. The Alliance believes that using an example vehicle weight of 1400 will result in a different load capacity (650 lbs.) than that of the combined weight of the passengers (750 lbs.) and will help avoid any potential consumer confusion.

[C.] Other Issues

1 FMVSS 110 and 120

The NPRM states that the agency will be issuing a separate NPRM that proposes tire performance requirements and procedures. However, this labeling NPRM proposes to amend the applicability of FMVSS 110 and 120. Currently, FMVSS 110 applies to passenger cars, and FMVSS 120 applies to multipurpose passenger vehicles, trucks,

buses, trailers and motorcycles. The NPRM proposes that FMVSS 110 apply to motor vehicles with a GVWR of 10,000 pounds or less. This NPRM mainly deals with the labeling issues, and does not address the tire performance requirements and procedures that the agency has indicated will be in a separate NPRM.

The implications of this proposed applicability amendment are mentioned briefly in the preamble at FR 65556. FMVSS 110 S4.2.2 establishes a linkage between the normal load and the load specified for the high-speed test in FMVSS 109. This requirement is not in the current FMVSS 120. This means that S4.2.2 will be extended to cover MPV's, SUV's, vans and pickup trucks for the first time. However, S4.2.2 of FMVSS 110 contains a table to specify occupant loading and distribution for only two rows of seats because it was only applicable to passenger cars. Thus, this NPRM does not provide sufficient details to evaluate the effects of this proposal, especially for non-passenger car vehicles.

The proposal would also extend S4.4.1 (b) of FMVSS 110, which requires that each rim shall retain a deflated tire in the event of a rapid loss of inflation pressure from a vehicle speed of 97 km/h until the vehicle is stopped with a controlled braking operation, to vehicles other than passenger cars for the first time.

The proposed effective date for these amendments is September 1, 2003.

It is not feasible to evaluate the effects of these changes until the agency publishes the NPRM regarding the tire performance requirements and procedures. The two changes proposed in this NPRM, due to the proposed change in the applicability, would have to be evaluated along with the proposals in the subsequent NPRM. However, it should be noted that vehicles other than the passenger cars are not subject to S4.2.2 and S4.4.1 (b) of FMVSS 110. The tires on vehicles other than passenger cars will have to be evaluated to determine the impacts of these changes. If any of these tires have to be replaced by different tires, those tires will have to be developed for the specific applications, and will have to go through testing and validation, including brake certification. It does not seem feasible to meet the effective date of September 1, 2003. These changes should be coordinated with the upgraded tire standards and an appropriate lead time provided. Further, the industry will likely need a phase-in period to implement these significant changes. However an appropriate phase-in schedule cannot be determined until we have been able to assess the impact of the soon to be published tire performance NPRM.

For the above reasons the Alliance recommends that NHTSA drop these changes from this Docket and incorporate them into the NPRM to be published on the tire performance requirements.

2. Rim size and Type Designation for Light Trucks and Multipurpose Passenger Vehicles

Addressed under VI C.2 - Vehicle Placard Content and Format.

3. Maximum Tire Inflation Pressure

Addressed under VI C.1 – Tire Markings.

4. UTQGS

The Alliance defers comments on this issue until publication of a UTQGS proposal.

5. Consumer Information Campaign

Addressed under VI. C.5 – Owners Manual.

6. Point of Sale Information

The Alliance agrees that requiring point of sale information is not necessary. This is addressed under VI. C.5 – Owners Manual.

7. Vehicle Certification Labels

Addressed under VI C.2--Vehicle Placard Content and Format.

8. International Harmonization

Addressed under VI C.1 Tire Markings.

9. Organization of Tire Labeling Information

The Alliance defers to the agency with regard to the development of a brochure explaining the tire requirements to consumers. This issue is also addressed under VI. C.5 – Owners Manual.

VII Request for Comments on Particular Issues

(1) The agency requests comments on whether it should consider defining "a reasonable amount of luggage" (49 U.S.C. 30123) when all designated seating positions are occupied.

Providing such a definition will serve no safety need, and will interfere with what is currently a competitive matter among manufacturers (i.e., luggage capacity). The agency is already proposing to add a statement to the placard stating that "[t]he combined weight of occupants and cargo should never exceed XXX pounds," along with a corresponding explanation of proper loading in the owner's manual. This statement and associated

explanation appropriately and adequately address the safety aspects of vehicle loading and thus obviate the need for the agency to define "reasonable amount of luggage." Moreover, depending upon the actual weight of the occupants, the luggage carrying capacity may vary significantly. Therefore the Alliance recommends that the agency not define "reasonable amount of luggage" in this rulemaking

(2) NHTSA requests comments on which, if any, labeling requirements in any foreign or international standard should be considered by NHTSA and why.

The Alliance believes that requirements such as speed-rating and load index labeling in Europe add value and therefore should be allowed as part of the information on the tire sidewall. See our response in to Section C.1. Tire Markings for our detailed comments.

(3) Should NHTSA consider prohibiting some or all non-required information from being labeled on the tire sidewall?

The Alliance strongly discourages NHTSA from prohibiting any optional tire sidewall markings, which might undermine acceptance of the TIN number in other countries, lead to unique tires in North America or result in the wrong aftermarket tires being used on vehicles. Please see Section C.1.Tire Markings for our detailed comments.

All aspects of the current TIN, including the tire size and construction codes and the existing tire marking order should be required to uniquely identify tires for recall. The European tire load index and speed rating should also be allowed to be included to ensure accurate aftermarket tire replacement. At the very least they should not be prohibited from the tire sidewall, leaving manufactures and customers with simple method to identify tires for a recall or replace their tires with the appropriate aftermarket tires.

X. Lead Time

Section 11 of the TREAD Act mandates the date for promulgation of final rules to accomplish the actions proposed in this Notice. Because Congress did not set a date by which all the covered tires and vehicles would have to meet the improved tire information requirements, the Agency has proposed a phase-in schedule that it notes is consistent with the lead-time to be proposed for the tire performance upgrade in a subsequent Docket.

This Notice in Docket 01-11157 relates only to the tire and vehicle information requirements and not to the tire performance upgrade. Therefore, the Alliance is reserving comment on lead-time considerations for the tire performance upgrade until the NPRM on that subject is issued.

With respect to this tire and vehicle labeling NPRM, NHTSA is proposing an effective date of September 1, 2003 for the light vehicle labeling requirements and for the labeling of P-metric tires, and an effective date of September 1, 2004 for LT tires. The Alliance recommends that NHTSA establish a uniform September 1, 2004 effective date for all of

the requirements proposed in this Notice to permit individual vehicle manufacturers to phase-in the labeling and owner's manual information changes on a practicable and cost effective time table. The Alliance recommends that the Final Rule permit optional early compliance with the tire information and labeling requirements prior to the mandatory effective date.

Alliance Other Issues

Non-Pneumatic Spare Tire Information

Currently, FMVSS 110 S4.3 (e) states:

> For a vehicle equipped with a non-pneumatic **spare tire** assembly, the **non-pneumatic** tire identification code with which that assembly is labeled pursuant to the requirements of S4.3(a) of § 571.129, *New Non-Pneumatic Tires for Passenger Cars*. (emphasis added)

However, the proposed language for this section of FMVSS 110, S4.3(g) states:

> For a vehicle equipped with a non-pneumatic assembly, the tire identification code with which that assembly is labeled pursuant to the requirements of S4.3(a) of § 571.129, *New Non-Pneumatic Tires for Passenger Cars*.

The proposed language drops the words "spare tire" and "non-pneumatic" as they appear currently in FMVSS 110 S4.3 (e). We assume that this omission is an oversight, rather than intentional alteration of the purpose of this requirement and recommend that the missing words be restored to this section in the final rule.

Aftermarket Tires

The proposed rulemaking for vehicle labeling applies to new vehicles and the recommended tire(s) for this vehicle. The rulemaking does not address the aftermarket situation where non-recommended tires and wheels are substituted for those developed, validated and delivered by the automotive manufacturer. When this occurs, the vehicle placard tire pressure information, tire load and related information may no longer be correct.

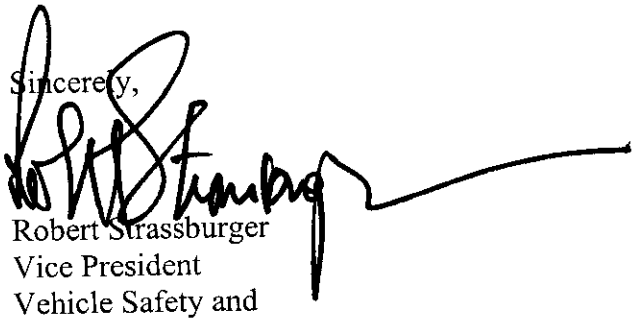
NHTSA does not address what are the responsibilities of providers of aftermarket tires when they equip a consumer's vehicle with tires, which do not match the original equipment tires in any or all of the following critical tire characteristics:

- Tire size
- Tire speed rating
- Tire load index

The Alliance requests NHTSA address these aftermarket tire provider responsibilities.

Please call Vann Wilber at (248) 357-4717 to arrange any additional discussion that may assist the Agency in reaching a decision on Tire Safety Information.

Sincerely,



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